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November 22, 1993

BY HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Stop Code 1170
Washington, D.C. 20554

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DEC - 23 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Ex Parte Presentation of Calling Communications Corporation
Concerning Ex Parte Filings by
Suite 12 Group, November 22, 1993
CC Docket No. 92-297

Dear Mr. Caton:

We are writing this letter on behalf of Calling Communications Corporation ("Calling"). In comments filed with the Commission in the above-captioned proceeding, Calling announced its plan to apply for authority for a low earth orbit satellite system that will primarily provide fixed satellite service and will operate in part of the frequency band that the FCC has proposed to redesignate for a new local multipoint distribution service. As such, Calling has a significant interest in the outcome of the above-captioned proceeding.

On November 22, 1993, Suite 12 Group ("Suite 12"), petitioner in the above-referenced rulemaking proceeding, filed on an ex parte basis copies of two engineering reports prepared by Bernard Bossard. One of the reports described Mr. Bossard's views on the current status of digital video compression techniques and concluded that application of digital compression technology to Suite 12's CellularVision technology for Local Multipoint Distribution Service ("LMDS") at this time would not serve the public interest. The other report by Mr. Bossard urges the Commission to allocate two 1 GHz blocks of spectrum per service area in the 28 GHz band for the provision of LMDS service.

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Mr. William F. Caton

December 3, 1993

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The Commission has proposed to allocate spectrum in the 28 GHz band for LMDS service. See Notice of Proposed Rulemaking, Order, Tentative Decision and Order on Reconsideration, FCC 92-538 (released January 8, 1993) ("NPRM"). This proposal is based in part on the assumption that there is little or no demand for the spectrum by other users and services. Comments filed in response to the NPRM, including those filed by Calling, demonstrated that there is significant demand for spectrum in this band, particularly among satellite operators. In addition, Calling and other commenting parties have shown that technological solutions can dramatically reduce the spectrum requirements for the LMDS service proposed by the FCC.

Suite 12's ex parte filings consist of technical engineering reports that raise issues about the spectrum requirements of LMDS and the feasibility of using digital compression technology to render the LMDS service more spectrally efficient. These are among the core questions at issue in the rulemaking proceeding. Given the concerns articulated by numerous satellite operators in this proceeding, including the National Aeronautics and Space Administration, about the spectrum demands of LMDS and the interference potential between Ka-band satellite operators and LMDS operators, Calling urges the Commission to afford the parties to this proceeding an opportunity to comment upon Suite 12's ex parte filings. Such an opportunity is necessary to ensure that the Commission has a complete record before it when it considers adoption of the proposals contained in the NPRM.

Questions or correspondence with respect to the foregoing may be directed to the undersigned.

Very truly yours,



Tom W. Davidson

cc: Chairman Reed Hundt
Commissioner James Quello
Commissioner Andrew Barrett
Commissioner Ervin Duggan
Kathleen Levitz, Esq.
Dr. Thomas Stanley